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February 28, 2011

VIA ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**RE: 2011 Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36**

Dear Secretary Dortch:

Please find attached the 2011 Annual Customer Proprietary Network Information
("CPNI") Compliance Certification for Line Systems, Inc.

Please contact the undersigned if you have any questions regarding this filing.

Respectfully Submitted,



Christopher S. Koves
Counsel to Line Systems, Inc.

Attachment

LINE SYSTEMS, INC.

ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION

EB DOCKET NO. 06-36

Annual Section 64.2009(e) CPNI Certification for 2011 covering prior calendar year 2010.

Name of Company: Line Systems, Inc.
Form 499 Filer ID: 821466
Name of Signatory: Kevin McGeary
Title of Signatory: Chief Operating Officer

I, Kevin McGeary, certify that I am an officer of Line Systems, Inc. ("LSI"), and acting as an agent of LSI, that I have personal knowledge that LSI has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("Commission's" or "FCC's") Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how LSI's procedures ensure that LSI is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules. *See* 47 C.F.R. § 64.2001(e).

LSI did not receive any customer complaints during the above-referenced certification period concerning the unauthorized release of CPNI. LSI has not taken any actions (*i.e.* instituted proceedings or filed petitions at either state commissions, the court system, or at the FCC) against data brokers during the above-referenced certification period. LSI has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps that LSI is taking to protect CPNI are described in the attached statement that summarize LSI's operating procedures for compliance with the Commission's CPNI rules.

Date: 2/25/11

Kevin McGeary
Kevin McGeary
Chief Operating Officer
Line Systems, Inc.

**STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

Line Systems, Inc. ("LSI") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in Section 64.2001 *et seq.* of the Commission's rules. This attachment summarizes those practices and procedures.

A. Safeguarding Against Pretexting

1. LSI takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. LSI is committed to notifying the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

B. Training and Discipline

2. LSI trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is; (b) join in and carry-out LSI's obligation to protect CPNI; (c) understand when they are and when they are not authorized to use or disclose CPNI; (d) obtain customers' informed consent as required with respect to its use for marketing purposes; and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing campaigns.

3. LSI employees are required to review LSI's CPNI practices and procedures and to acknowledge their comprehension thereof.

4. LSI also requires all outside Dealers and Agents to review LSI's CPNI practices and procedures and to acknowledge receipt and review thereof.

5. LSI has an express disciplinary process in place for violation of the company's CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

C. LSI's Use of CPNI

6. LSI uses CPNI for the purpose of providing a customer with the requested service and such uses as permitted by law. For example, LSI may use, disclose or permit access to CPNI for the following purposes:

- a. to initiate, render, maintain, repair, bill and collect for services;
- b. to protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
- c. to provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent;
- d. to market additional services to customers that are within the same categories of service to which the customer already subscribes;

- e. to provide customer provided equipment (“CPE”) and call answering, voicemail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion;
- f. to market services formerly known as adjunct-to-basic services; and
- g. where required by law (e.g., under a lawfully issued subpoena).

7. LSI does not use, disclose or permit access to CPNI to track customers that call competing service providers. LSI maintains CPNI no longer than necessary for its original purpose, except when required to maintain CPNI by law or for any legitimate business purpose. LSI does not market or otherwise sell CPNI to any third party.

8. When LSI discloses CPNI or provides access to CPNI to independent contractors or joint venture partners, it does so pursuant to confidentiality agreements that: (a) require the independent contractor/joint venture partner to use CPNI only for the purpose it has been provided; (b) prohibit the independent contractor/joint venture partner from disclosing such CPNI except under force of law; and (c) require the independent contractor/joint venture partner to have appropriate protections in place to ensure the ongoing confidentiality of the CPNI.

D. Customer Approval and Informed Consent

9. LSI has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system also allows for the status of a customer’s CPNI approval to be clearly established prior to the use of CPNI. Prior to any solicitation for customer approval, LSI notifies customers of their right to restrict the use of, disclosure of, and access to their CPNI. LSI uses opt-in approval when using or disclosing CPNI for purposes other than permitted under opt-out approval or 47 U.S.C. § 222 and the FCC’s CPNI rules. A customer’s approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval. Records of approvals are maintained for at least one year. LSI provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI. The content of LSI’s CPNI notices comply with Section 64.2008(c) of the FCC’s rules.

10. ***Opt-Out.*** LSI uses opt-out for the marketing of communications related services by its employees outside the category of service to which the customer subscribes and for affiliate marketing of any communications related services. When LSI uses opt-out approval, LSI provides notification by electronic or written methods and waits at least 30 days after sending customers notice (for mail notifications, the 30 days begins to run 3 days after the notice was sent) and an opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI. LSI provides customers with opt-out notifications every two years. When using email for opt-out notices, LSI complies with the additional notice requirements set forth in Section 64.2008(d)(3) of the FCC’s rules. Additionally, LSI makes available to every customer an opt-out method, at no additional charge, that is available 24 hours a day, seven days a week.

11. ***Opt-In.*** LSI uses opt-in approval for marketing by independent contractors and joint venture partners and for marketing non-communications-related services by itself and its affiliates. When LSI uses opt-in approval, LSI provides notification consistent with Section 64.2008(c) of the FCC’s rules.

12. ***One Time Use.*** After authentication, LSI uses oral notice to obtain limited, one-time approval for use of CPNI for the duration of a call. The contents of such notice comports with Section 64.2008(f) of the FCC’s rules.

E. Additional Safeguards

13. LSI maintains for at least one year records of all marketing campaigns that use its customers' CPNI, including a description of each campaign and the CPNI used, the products offered as part of the campaign, and instances where CPNI was disclosed to third parties or where third parties were allowed access to CPNI. Such campaigns are subject to a supervisory approval and compliance review process, the records of which also are maintained for a minimum of one year.
14. LSI has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules for outbound marketing situations and maintenance of records.
15. LSI designates one or more officers, as an agent or agents of the company, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in Section 64.2009(e) of the FCC's rules.
16. LSI will provide written notice to the Commission in accordance with the requirements of Section 64.2009(f) of the FCC's rules if ever its opt-out mechanisms malfunction in the manner described therein.
17. For customer-initiated telephone inquiries regarding or requiring access to CPNI, LSI authenticates the customer (or its authorized representative), through a pre-established password, without prompting through the use of readily available biographical or account information. If the customer cannot provide a password, then LSI only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.
18. For online customer access to CPNI, LSI authenticates the customer (or its authorized representative) without the use of readily available biographical or account information. After the customer has been authenticated, LSI utilizes a customer-established password to authorize account access. LSI establishes passwords and has employed back-up authentication for lost or forgotten passwords consistent with the requirements of Section 64.2010(e) of the FCC's rules.
19. LSI does not have any retail locations.
20. LSI notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
21. LSI may negotiate alternative authentication procedures for services that LSI provides to business customers that have both a dedicated account representative and a contract that specifically addresses LSI's protection of CPNI.

F. Law Enforcement and Required Disclosures

22. Within 7 days of a reasonable determination of a breach of CPNI, LSI will notify the U.S. Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") of the breach via the central reporting facility www.fcc.gov/eb/cpni. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs LSI to delay notification, or LSI and the investigatory party agree to an earlier notification. LSI will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.